

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NETSOC, LLC,
Plaintiff,

v.

YAHOO! INC.
Defendant.

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)
)
)
)
)
)

Civil Action No. _____

JURY TRIAL DEMANDED

PLAINTIFF’S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

NetSoc, LLC (“NetSoc”) files this Original Complaint and demand for jury trial seeking relief from patent infringement of the claims of U.S. Patent No. 9,978,107 by Yahoo! Inc., alleging as follows:

I. THE PARTIES

1. Plaintiff NetSoc is a Texas Limited Liability Company with its principal place of business located in Harris County, Texas.

2. On information and belief, Yahoo! Inc. (“Yahoo”) is a foreign corporation organized and existing under the laws of Delaware, with a principal place of business located at 229 West 43rd Street, New York, New York 10036. Yahoo may be served through its registered agent Corporation Service Company at 80 State St., Albany, New York 12207-2541 . On information and belief, Yahoo sells and offers to sell products and services throughout New York, including in this judicial district, and introduces products and services that perform infringing methods or processes into the stream of commerce knowing that they would be sold in New York and this judicial district.

II. JURISDICTION AND VENUE

3. This Court has original subject-matter jurisdiction over the entire action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because Plaintiff's claim arises under an Act of Congress relating to patents, namely, 35 U.S.C. § 271.

4. This Court also has original subject-matter jurisdiction over the entire action pursuant to 28 U.S.C. § 1332(a)(1) because Plaintiff is a limited liability company organized under the laws of the State of Texas and Defendant is a Delaware Corporation with a principal, physical place of business at 229 West 43rd Street, New York, New York 10036. The matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

5. This Court has personal jurisdiction over Defendant because: (i) Defendant is present within or has minimum contacts within the State of Texas and this judicial district; (ii) Defendant has purposefully availed itself of the privileges of conducting business in the State of New York and in this judicial district; and (iii) Plaintiff's cause of action arises directly from Defendant's business contacts and other activities in the State of New York and in this judicial district.

6. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1400(b). Defendant has committed acts of infringement and has a regular and established place of business in this District. Further, venue is proper because Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in New York and this District.

III. INFRINGEMENT ('107 Patent)

7. On May 22, 2018, U.S. Patent No. 9,978,107 (“the ’107 patent”, attached as Exhibit A) entitled “Method and System for Establishing and Using a Social Network to Facilitate People in Life Issues” was duly and legally issued by the U.S. Patent and Trademark Office. NetSoc, LLC owns the ’107 patent by assignment.



















8. The ’107 patent relates generally to a method and system for establishing and using a social network to facilitate people in life issues.

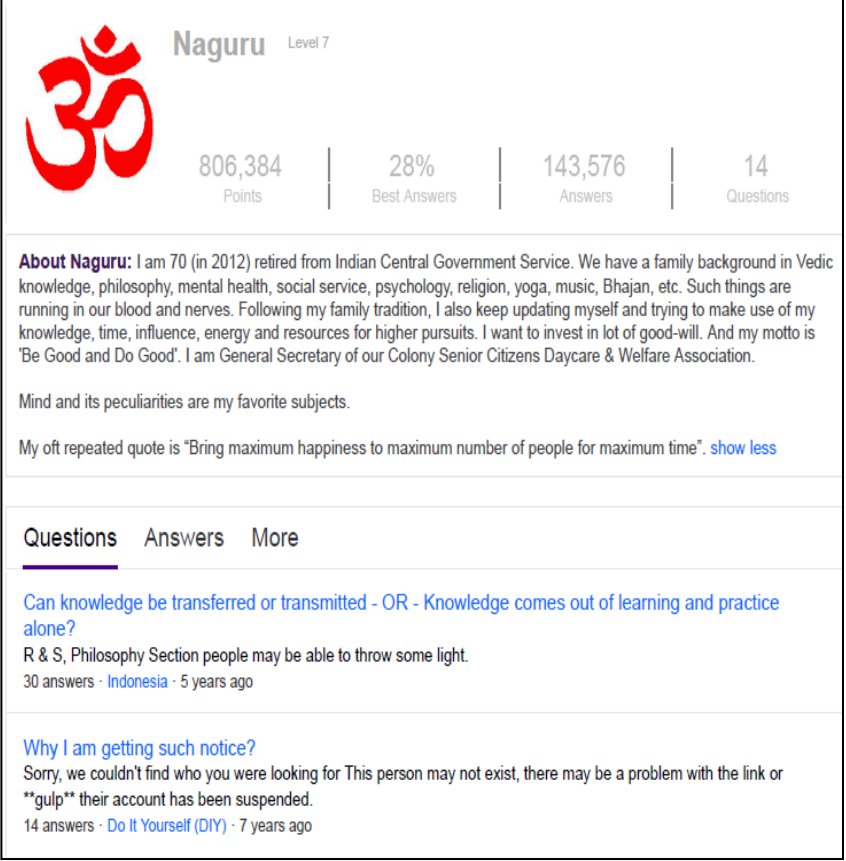
9. Yahoo maintains, operates, and administers a website at www.yahoo.com that infringes one or more claims of the ’107 patent, including at least claims 1-11, literally or under the doctrine of equivalents. Defendant put the inventions claimed by the ’107 Patent into service (i.e., used them); but for Defendant’s actions, the claimed-inventions embodiments involving Defendant’s products and services would never have been put into service. Defendant’s acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant’s procurement of monetary and commercial benefit from it.

10. Support for the allegations of infringement may be found in the following preliminary table:

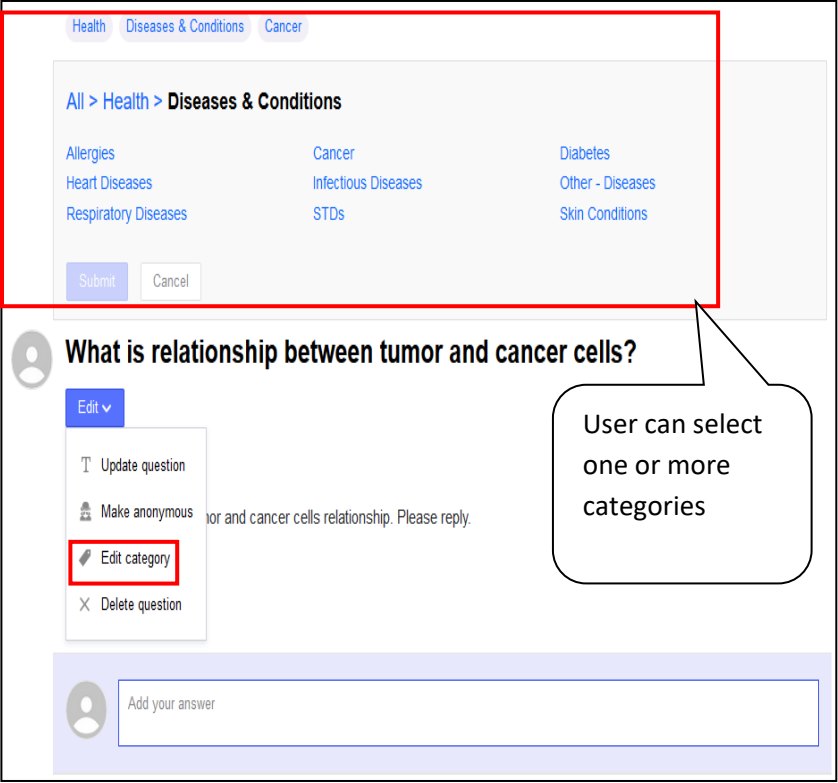
Claim 1	Accused Product or Service
1. A method for establishing a social network, the method comprising:	Plaintiff contends that Yahoo! Answers Service offers a method of social network.

Claim 1	Accused Product or Service
	<p data-bbox="630 268 1409 373">Knowledge Sharing in the Online Social Network of Yahoo! Answers and Its Implications</p> <p data-bbox="667 384 1365 422">Haiying Shen*, Senior Member, IEEE, Ze Li, Jinwei Liu, Joseph Edward Grant</p> <p data-bbox="605 474 1430 552">Abstract—Question and Answer (Q&A) websites such as Yahoo! Answers provide a platform where users can post questions and receive answers. These systems take advantage of the collective intelligence of users to find information. In this paper, we analyze the online social network (OSN) in Yahoo! Answers. Based on a large amount of our collected data, we studied the</p> <p data-bbox="597 579 1406 695">Attachment 1 (Knowledge Sharing in the Online Social Network of Yahoo! Answers and Its Implications (2014)) at 1.</p>
<p data-bbox="203 741 565 1318">maintaining a list comprising a plurality of participants, wherein each participant in the plurality of participants corresponds to one or more individuals, wherein the list also includes information associated with at least one of each participant or the one or more individuals that correspond to each participant;</p>	<p data-bbox="597 741 1406 856">Plaintiff contends that with the help of data-centers or servers, Yahoo maintains data of plurality of participants or individuals along with their information.</p> <div data-bbox="605 884 1422 947" style="border: 1px solid black; padding: 5px;"> <p data-bbox="621 894 1406 930">Yahoo! kicks off US\$500m data center consolidation</p> </div> <p data-bbox="605 989 1430 1209">Yahoo! (URL=http://www.yahoo.com) is revamping its entire data center infrastructure. The company is investing more than \$500m in new data center construction on three continents, its VP of operations Scott Noteboom announced at the DatacenterDynamics New York 2011 conference (URL=http://www.datacenterdynamics.com/conferences/2011/new-york) on Thursday, 10 March.</p> <p data-bbox="605 1255 1430 1402">Many of the new data centers will be built to the next generation of Yahoo!'s data center design called Flex Tier Data Center. The multi-tier design promises to reduce construction time to five months per phase, lower cost to \$3m-\$5m per 1MW and provide higher uptime for critical applications.</p> <p data-bbox="597 1434 1422 1549">Attachment 3 (Yahoo! kicks off US\$500m data center consolidation News DatacenterDynamics (Webpage, 2011)) at 1 and 2.</p> <div data-bbox="605 1602 1414 1759" style="border: 1px solid black; border-radius: 15px; padding: 10px;"> <p data-bbox="630 1623 1260 1696">Yahoo stores and maintains a list of its participants or customers along with their associated information.</p> </div>

Claim 1	Accused Product or Service																																			
	<div><div>Leaderboard</div><div><div>United States Overall</div><div>United States Weekly</div><div>Global Overall</div><div>Global Weekly</div></div><table><tr><th>Rank</th><th>Leader</th><th>Points</th><th>Answers</th><th>Questions</th></tr><tr><td>1</td><td><div> AuntKatie Level7</div></td><td>1,784,408</td><td>144,244</td><td>19</td></tr><tr><td>2</td><td><div> conley39 Level7</div></td><td>1,663,570</td><td>224,751</td><td>0</td></tr><tr><td>3</td><td><div> Experto Credo Level7</div></td><td>1,418,412</td><td>172,844</td><td>3</td></tr><tr><td>4</td><td><div> postal p Level7</div></td><td>1,185,071</td><td>88,178</td><td>6</td></tr><tr><td>5</td><td><div> DrlG Level7</div></td><td>1,153,871</td><td>101,496</td><td>5</td></tr><tr><td>6</td><td><div> nas88car Level7</div></td><td>1,083,434</td><td>101,251</td><td>464</td></tr></table></div>	Rank	Leader	Points	Answers	Questions	1	<div> AuntKatie Level7</div>	1,784,408	144,244	19	2	<div> conley39 Level7</div>	1,663,570	224,751	0	3	<div> Experto Credo Level7</div>	1,418,412	172,844	3	4	<div> postal p Level7</div>	1,185,071	88,178	6	5	<div> DrlG Level7</div>	1,153,871	101,496	5	6	<div> nas88car Level7</div>	1,083,434	101,251	464
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Claim 1	Accused Product or Service
	<p data-bbox="613 289 1417 380">Information associated with each participant or individual is stored or maintained.</p> <div data-bbox="602 499 1442 1354">  <p>The screenshot shows a profile for 'Naguru' at Level 7. It features a red Om symbol icon. Statistics include 806,384 Points, 28% Best Answers, 143,576 Answers, and 14 Questions. The 'About Naguru' section describes a 70-year-old retired Indian Central Government Service employee with a background in Vedic knowledge, philosophy, mental health, social service, psychology, religion, yoga, music, and Bhajan. It mentions a motto of 'Be Good and Do Good' and a role as General Secretary of a Senior Citizens Daycare & Welfare Association. Below this, there are tabs for 'Questions', 'Answers', and 'More'. Two questions are visible: 'Can knowledge be transferred or transmitted - OR - Knowledge comes out of learning and practice alone?' with 30 answers from Indonesia 5 years ago, and 'Why I am getting such notice?' with 14 answers from 'Do It Yourself (DIY)' 7 years ago.</p> </div> <p data-bbox="597 1381 1421 1459">Attachment 4 (Questions Yahoo Answers (Webpage, 2018)) at 1.</p>
presenting a user with a plurality of categories from which the user may make a selection of a category from the plurality of categories;	Plaintiff contends that user (or asker) is presented with plurality of categories from which the user can select one or more categories.

Claim 1	Accused Product or Service																									
	<div><div><div><div>Answers Home</div><div>All Categories</div><div>Arts & Humanities</div><div>Beauty & Style</div><div>Business & Finance</div><div>Cars & Transportation</div><div>Computers & Internet</div><div>Consumer Electronics</div><div>Dining Out</div><div>Education & Reference</div><div>Entertainment & Music</div><div>Environment</div><div>Family & Relationships</div><div>Food & Drink</div><div>Games & Recreation</div><div>Health</div><div>Home & Garden</div><div>Local Businesses</div><div>News & Events</div><div>Pets</div><div>Politics & Government</div><div>Pregnancy & Parenting</div><div>Science & Mathematics</div><div>Social Science</div><div>Society & Culture</div><div>Sports</div><div>Travel</div><div>Yahoo Products</div></div><div><div>Leaderboard</div><div><div>United States Overall</div><div>United States Weekly</div><div>Global Overall</div></div><div>Global Weekly</div><table><tr><th>Rank</th><th>Leader</th><th>Points</th><th>Answers</th><th>Questions</th></tr><tr><td>1</td><td><div> AuntKatie Level 7</div></td><td>1,784,408</td><td>144,244</td><td>19</td></tr><tr><td>2</td><td><div> conley39 Level 7</div></td><td>1,663,570</td><td>224,751</td><td>0</td></tr><tr><td>3</td><td><div> Experto Credo Level 7</div></td><td>1,418,412</td><td>172,844</td><td>3</td></tr><tr><td>4</td><td><div> postal p Level 7</div></td><td>1,185,071</td><td>88,178</td><td>6</td></tr></table></div><div><div>Ask a question usually answered in minutes!</div><div>What's up?</div><div>Details <input type="button" value="Submit"/></div></div><div><div>Terms</div><div>Privacy</div><div>AdChoices</div></div></div></div>	Rank	Leader	Points	Answers	Questions	1	<div> AuntKatie Level 7</div>	1,784,408	144,244	19	2	<div> conley39 Level 7</div>	1,663,570	224,751	0	3	<div> Experto Credo Level 7</div>	1,418,412	172,844	3	4	<div> postal p Level 7</div>	1,185,071	88,178	6
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	<p>Attachment 2 (Leaderboard Yahoo Answers (Webpage, 2018)) at 1.</p> <div><div>User can select one or more categories</div><div><div><div><div>Ask clearly.</div><div>Keep your question clear and descriptive, and check your spelling and grammar. It helps people understand your questions, and you'll also get better answers. Read more</div></div><div><div>Categorize correctly.</div><div>Categorize your question in the appropriate category. You will receive better and more relevant answers. Read more</div></div></div></div></div> <p>Attachment 5 (Community Guidelines Yahoo Answers (Webpage, 2018)) at 1.</p>																									

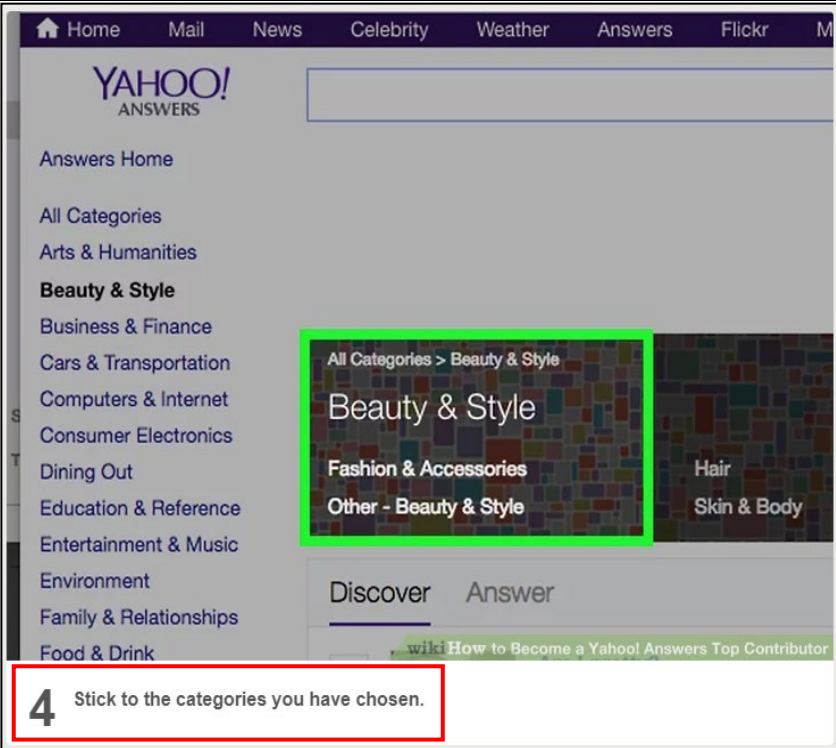
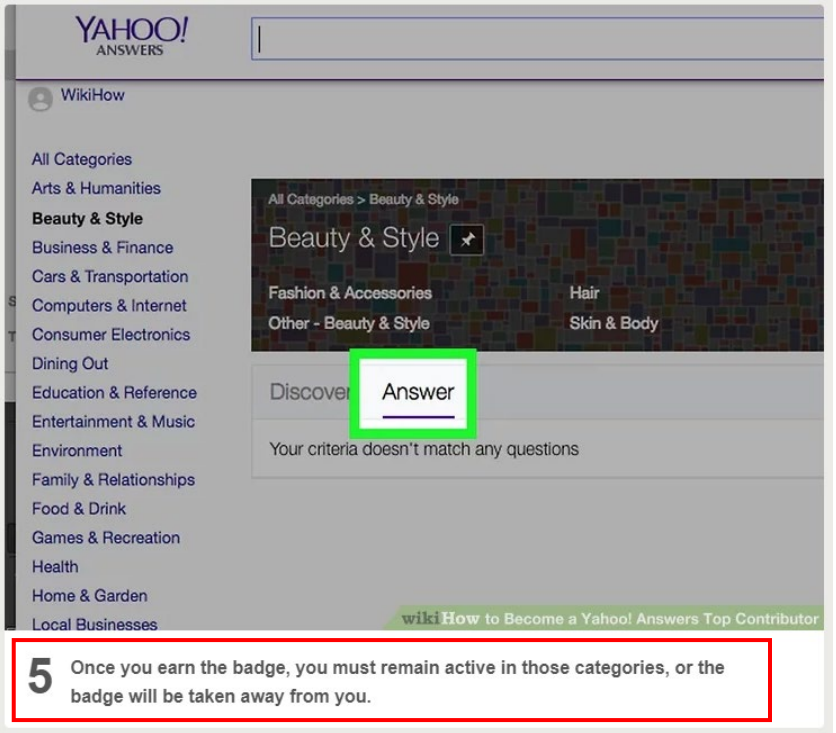
Claim 1	Accused Product or Service
	 <p>[Snapshot taken after creating a user profile in Yahoo! Answers]</p>
<p>receiving the selection of the category by the user; in conjunction with the selection of the category, receiving an electronic communication from the user for an unidentified respondent, wherein the electronic communication contains an inquiry of the user;</p>	<p>Plaintiff contends that user can select one or more categories as well as can describe his inquiry as a message, which is posted on the Yahoo! Answers. Also, the respondents or answerers remain unidentified.</p> <p>User can type his inquiry as well as can also specify relevant category with respect to his inquiry by selecting at least one category.</p>

Claim 1	Accused Product or Service
	<div><div><div>What is relationship between tumor and cancer cells?</div><div>Hello, I want to know about tumor and cancer cells relationship. Please reply. Thanks.</div><div><div><div></div><div>Add photo/video</div></div></div><div><div>Submit</div><div>Cancel</div></div><div><div>Asking a question costs 5 points, but you'll get back 3 points when you choose a Best Answer. Question should follow the Community Guidelines</div></div></div><div>Electronic communication (containing inquiry) from the user for an unidentified respondent</div></div>
	<div><div><div>Health Diseases & Conditions Cancer</div><div>All > Health > Diseases & Conditions</div><div><div>Allergies</div><div>Heart Diseases</div><div>Respiratory Diseases</div><div>Cancer</div><div>Infectious Diseases</div><div>STDs</div><div>Diabetes</div><div>Other - Diseases</div><div>Skin Conditions</div></div><div><div>Submit</div><div>Cancel</div></div></div><div><div><div></div><div>What is relationship between tumor and cancer cells?</div><div><div>Edit</div><div><div>Update question</div><div>Make anonymous</div><div>Edit category</div><div>Delete question</div></div></div></div><div><div>or and cancer cells relationship. Please reply.</div></div><div>User can select one or more categories</div><div><div><div></div><div>Add your answer</div></div></div></div></div>

[Snapshot taken after creating a user profile in Yahoo! Answers]

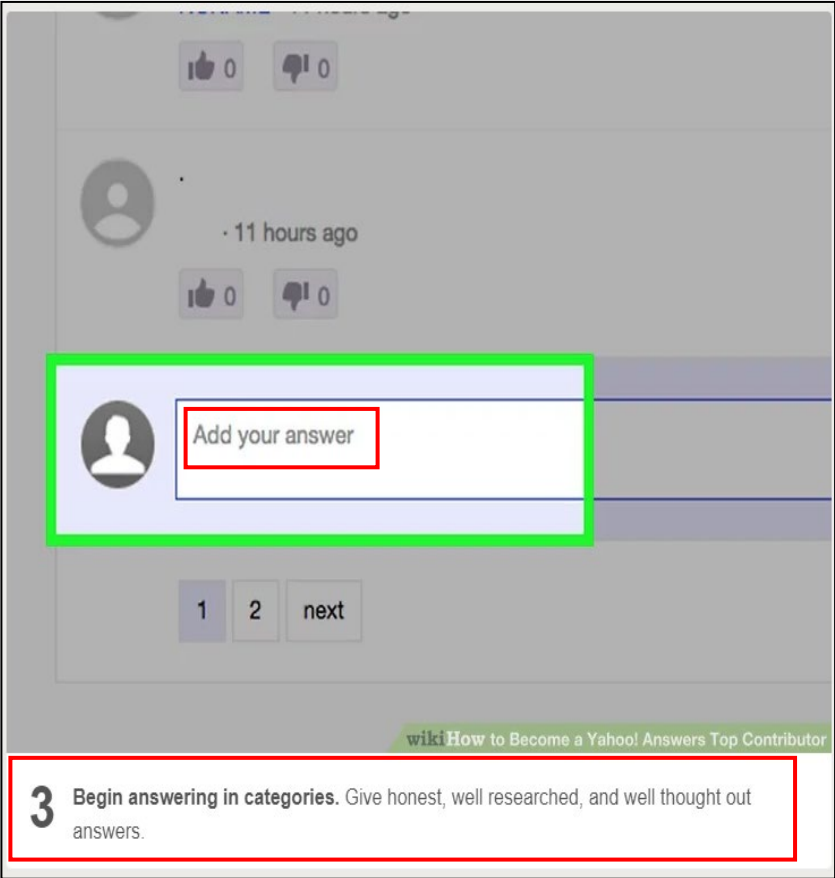
Claim 1	Accused Product or Service
	<p>[Snapshot taken after creating a user profile in Yahoo! Answers]</p>  <p>The screenshot shows the Yahoo! Answers interface. At the top, there are tabs for 'Health', 'Diseases & Conditions', and 'Cancer'. Below these, a breadcrumb trail reads 'All > Health > Diseases & Conditions > Cancer'. There are 'Submit' and 'Cancel' buttons. Below this, a question is posted: 'What is relationship between tumor and cancer cells?'. The question has an 'Edit' button, a 'Hello,' greeting, and the text 'I want to know about tumor and cancer cells relationship. Please reply.' and 'Thanks.'. It shows '0 following'. At the bottom, there is a text input field labeled 'Add your answer'. A red rectangle highlights the breadcrumb trail and the 'Submit' and 'Cancel' buttons. A callout box points to the 'Cancer' category in the breadcrumb trail with the text 'Selection of the category by the user'.</p> <p>[Snapshot taken after creating a user profile in Yahoo! Answers]</p>
<p>after receiving the selection of the category by the user, selecting one or more participants from the list to receive the electronic communication, wherein selecting is based at least in part on the selection of the category or the information associated with at least one of each participant or the one or more individuals that</p>	<p>Plaintiff contends that each participant on Yahoo! Answers can select one or more categories based on his interest or expertise or knowledge so that he can answer any questions (related to those categories) of one or more users. When user posts any question or inquiry along with selection of the category (for unidentified respondents), those participants who have opted the same category which is mentioned in user's inquiry, they can see the user's question or inquiry on their profile pages and can respond to the user's inquiry.</p>

Claim 1	Accused Product or Service
<p>correspond to each participant;</p> <p>Each participant can select at least one category to answer any questions related to that category.</p>	<div></div> <p>Attachment 6 (How to Become a Yahoo! Answers Top Contributor (Webpage)) at 1.</p>


Claim 1	Accused Product or Service
	<div><p>4 Stick to the categories you have chosen.</p></div> <p><i>Id. at 2.</i></p> <div><p>5 Once you earn the badge, you must remain active in those categories, or the badge will be taken away from you.</p></div> <p><i>Id. at 3.</i></p>

Claim 1	Accused Product or Service
	<div><div><div><div><div><div>Home</div><div>Mail</div><div>Tumblr</div><div>News</div><div>Sports</div><div>Finance</div><div>Entertainment</div><div>Lifestyle</div><div>Answers</div><div>Groups</div><div>Mobile</div></div></div><div><div><div></div><div>Search Answers</div><div>Search Web</div></div></div><div>All Categories > Consumer Electronics > Music & Music Players</div><div>Music & Music Players</div><div><div>Discover</div><div>Answer</div></div><div><div><div></div><div><div>What's the best way to power 4 2000w car amplifiers at home?</div><div>I need a way to power 4 2000w subwoofers for use in a home theater and I decided to use car amplifiers since I would be able to create my own power source of sorts by using a 12v battery. What's the best way of going about doing this? I only need the car amplifier to run at full tilt for less than 20 minutes... show more</div><div>7 answers · 1 week ago</div></div></div><div><div></div><div><div>Do you need computer to set up condenser mic?</div><div>8 answers · 2 weeks ago</div></div></div><div><div></div><div><div>Are MP3 players going to disappear ?</div><div>Since every smartphone plays MP3s ?</div><div>7 answers · 2 weeks ago</div></div></div><div><div></div><div><div>I just bought BM-700 Microphone and phantom power but it seems a need a laptop for it to work? Is there a way to not been the laptop?</div><div>4 answers · 2 weeks ago</div></div></div><div><div></div><div><div>Our radio just quit working. It gets power. CD player & aux input work fine. Radio seems to be tuning to stations, but no sound. Ideas?</div><div>3 answers · 2 weeks ago</div></div></div></div></div><div><div>Top Answerers</div><div><div>In Music & Music Players</div><div>Best Answers</div></div><div><div><div>1</div><div></div><div>NONE</div><div>11,396</div></div><div><div>2</div><div></div><div>cantilena91</div><div>6,221</div></div><div><div>3</div><div></div><div>Albex</div><div>5,501</div></div><div><div>4</div><div></div><div>Scatwoman</div><div>4,911</div></div><div><div>5</div><div></div><div>Einat B</div><div>3,650</div></div><div><div>6</div><div></div><div>Diana B</div><div>2,981</div></div><div><div>7</div><div></div><div>Freckles...</div><div>2,926</div></div><div><div>8</div><div></div><div>Daniel K</div><div>2,890</div></div><div><div>9</div><div></div><div>SRASC</div><div>2,758</div></div></div></div></div></div>

Claim 1	Accused Product or Service
	<p data-bbox="597 321 1357 401">Attachment 7 (Music & Music Players Yahoo Answers (Webpage, 2018)) at 1 and 2.</p> <div data-bbox="602 485 1419 638" style="border: 1px solid black; border-radius: 10px; padding: 10px;"> <p data-bbox="625 506 1354 617">Based on the selection of category or participant information (that is, category interests), one or more participants are shortlisted so that they can view user's inquiry or question.</p> </div>
<p data-bbox="201 730 529 848">sending the inquiry to the selected one or more participants;</p>	<p data-bbox="597 730 1425 806">Plaintiff contends that in case of Yahoo! Answers, user's inquiry is shared with one or more participants.</p> <div data-bbox="602 842 1419 915" style="border: 1px solid black; border-radius: 10px; padding: 10px;"> <p data-bbox="625 861 1263 890">User's inquiry is shared with one or more participants</p> </div>





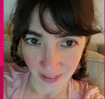
Claim 1	Accused Product or Service
receiving a response to the inquiry from the selected one or more participants, the response from each of the one or more participants including biographical information about that participant;	<p>Plaintiff contends that one or more participants can responds to the user’s inquiry. Each participant’s biographical information is also shared along with the response.</p>  <p>The screenshot shows a Yahoo! Answers interface. At the top, there are thumbs up and thumbs down icons, both with a '0'. Below this is a user profile picture and the text '11 hours ago'. Another set of thumbs up and thumbs down icons is visible. A green rectangular box highlights a section containing a user profile picture and a text input field with the placeholder text 'Add your answer'. Below this, there are pagination links '1', '2', and 'next'. At the bottom of the screenshot, a red rectangular box highlights a section with the number '3' and the text 'Begin answering in categories. Give honest, well researched, and well thought out answers.' A small green link 'wikiHow to Become a Yahoo! Answers Top Contributor' is visible above the red box.</p> <p>Attachment 6 (How to Become a Yahoo! Answers Top Contributor (Webpage)) at 2.</p>

Claim 1	Accused Product or Service
<p>User's inquiry</p> <p>Responses from one or more participants along with bibliographic information</p>	<div><div><div><div><div></div><div>Custom costume order gon wrong, what do I do?? Please, please help..?</div></div><div><p>Okay.. so i ordered this costume for comicon and she told me she could make it exactly like the photo i sent, she said exactly like the photo.. bell i got photos today and it resembled the costum at best.. i dont know what to do. The order is 2 months over due (I ordered it in january she said id have it by the end of February) and now comicon is in a little over 5 weeks way and its not even done! I m so pissed right now. I dont know what to do.. i want to cancel my order but shes put so much work and money into, and I ve put more then \$200 into it.. i dont want to lose my money.. and I dont want her to lose money but all at the same time.. i dont want this costume it looks nothing like how she promised.. now.. what do i do? What do I tell her? I dont want to hurt her feelings.. she trued very hard in the beginning now it looks like shes just slapping it together. Not to mention it takes forevet to get her to communicate with me.</p></div><div><div>Follow</div><div>3 answers</div></div></div></div><div><div><div>Answers</div><div>Relevance</div></div><div><div><div></div><div>Best Answer: Look, sometimes you just have to hurt people's feelings. If it's not what it's supposed to be and she's two months behind schedule, that's unacceptable.</div></div><div><p>Follow whatever steps the website has to request your money back. Take any emails you have about how long she said she'd take to do it, and any proof you have about it not looking how she promised, and send those along too.</p></div><div><div><div>Ashley M · 1 year ago</div><div><div>1</div><div>0</div></div><div>Comment</div></div><div><div>Asker's rating ★★★★★</div></div></div><div><div><div></div><div>If she can't fulfill the contract at this point, she's entitled to the costs of the fabric she's had to buy.</div></div><div><p>Cut your loss, cancel the work, let her keep the \$200. Find someone local next time to do the sewing.</p></div><div><div>Elaine M · 1 year ago</div></div></div></div></div></div>
	<p>Attachment 8 (Custom costume order gon wrong, what do I do?? Please, please help..? Yahoo Answers (Webpage)) at 1.</p>





Claim 1	Accused Product or Service
	<div>Participant's bibliographic information</div> <div><div><div><div>Ashley M</div><div>Level 7</div></div><div><div>381,271</div><div>Points</div></div><div><div>39%</div><div>Best Answers</div></div><div><div>55,340</div><div>Answers</div></div><div><div>569</div><div>Questions</div></div></div><div><div>About Ashley M:</div><div>I love Yahoo Answers. I try to be completely fair and honest even if I know that my answer may not be liked by everyone. I don't claim to be right 100% of the time, but I do like to think that my honesty and frankness does more good than bad. show less</div></div><div><div>Questions</div><div>Answers</div><div>More</div></div><div><div>How do they make eye glasses for small children?</div><div>Specifically, how do they determine what prescription the child needs? Because older children an adults can do the "better, or worse" thing...but what about the infants you see with glasses, or children who don't talk yet, or wouldn't understand what's being asked of them in the "better or worse?" situation?</div><div>2 answers · Optical · 2 years ago</div></div><div><div>I'd like to learn the basics of programming and coding, please help?</div><div>I'm aware that learning programming and coding is a lengthy process, and there's LOTS of different languages to learn. I know there are kits out there designed to teach kids the basics, and they wind up building an actual little program or something in the process. So what I'm wondering, is there something like that for adults who are... show more</div><div>4 answers · Programming & Design · 2 years ago</div></div></div> <div>Attachment 9 (Questions Yahoo Answers (Webpage)) at 1.</div>

Claim 1	Accused Product or Service
	 <p>Attachment 4 (Questions Yahoo Answers (Webpage, 2018)) at 1.</p>
publishing at least a portion of the response from each of the selected one or more participants for other users to view, wherein publishing is performed without identifying the user but includes providing biographical information about the participant who provided the response;	Plaintiff contends that a portion of response from each participant is published for other users to view. In Yahoo! Answers, user can anonymously post his inquiry (by selecting option “ Make anonymous ”) in which case user’s identity remains hidden. However, the biographical information of one or more participants who provided the responses can be viewed.

Claim 1	Accused Product or Service
	<div>User can anonymously share his inquiry in which case user's identity remains hidden</div> <div><div><div>HealthDiseases & ConditionsCancer</div><div>All > Health > Diseases & Conditions</div><div><div>Allergies</div><div>Heart Diseases</div><div>Respiratory Diseases</div><div>Cancer</div><div>Infectious Diseases</div><div>STDs</div><div>Diabetes</div><div>Other - Diseases</div><div>Skin Conditions</div></div><div><div>Submit</div><div>Cancel</div></div></div><div><div><div></div></div><div>What is relationship between tumor and cancer cells?</div><div><div>Edit</div><div><div>Update question</div><div><div>Make anonymous</div></div><div>Edit category</div><div>Delete question</div></div><div>or and cancer cells relationship. Please reply.</div></div><div><div><div></div></div><div>Add your answer</div></div></div></div> <div><div>[Snapshot taken after creating a user profile in Yahoo! Answers]</div></div>

Claim 1	Accused Product or Service
<p>Anonymous user</p> <p>Responses from one or more participants are displayed for other users to view without identifying the user</p>	<div><div>Education & ReferencePreschool</div><div>What are the main symptoms for abdominal cancer?</div><div>Edit</div><div>0 following11 answers</div><div>Answers</div><div>Relevance</div><div><div>I don't think it's actually called that. A person can have stomach cancer or colon cancer or pancreatic cancer, or uterine cancer, all located in the abdominal area.</div><div>sparrow · 2 days ago</div><div>Award Best Answer</div><div>0</div><div>0</div><div>Comment</div></div><div><div>Blood in stool</div><div>Winter157 · 6 days ago</div><div>Award Best Answer</div><div>0</div><div>0</div><div>Comment</div></div><div><div>Depends what sort of cancer.</div><div>thinkingtime · 1 week ago</div><div>Award Best Answer</div><div>0</div><div>0</div><div>Comment</div></div></div> <div><div><div>sparrowLevel 6</div><div>FollowBlock</div><div>24,456Points</div><div>6%Best Answers</div><div>6,786Answers</div><div>83Questions</div></div><div>QuestionsAnswersMore</div><div>Why is Yahoo Answers filled with Chinese. I'd rather not see these letters because I can't read Chinese? 1 answer · Languages · 1 month ago</div><div>If money given to the poor is stolen, does it take away it's blessing? Shouldn't money be given freely in order for it to truly be a blessing? 6 answers · Other - Business & Finance · 3 months ago</div></div> <p>[Snapshot taken after creating a user profile in Yahoo! Answers]</p>

Claim 1	Accused Product or Service
	<div data-bbox="646 327 1214 468" style="border: 1px solid black; border-radius: 10px; padding: 10px; margin-bottom: 20px;"> <p>Example of biographical information</p> </div> <div data-bbox="600 495 1435 1220" style="border: 1px solid black; padding: 10px;"> <div style="display: flex; align-items: center;">  <div style="margin-left: 10px;"> <p>Ashley M <small>Level 7</small></p> </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;"> <p>381,271</p> <p><small>Points</small></p> </div> <div style="text-align: center;"> <p>39%</p> <p><small>Best Answers</small></p> </div> <div style="text-align: center;"> <p>55,340</p> <p><small>Answers</small></p> </div> <div style="text-align: center;"> <p>569</p> <p><small>Questions</small></p> </div> </div> <div style="margin-top: 10px;"> <p>About Ashley M: I love Yahoo Answers. I try to be completely fair and honest even if I know that my answer may not be liked by everyone. I don't claim to be right 100% of the time, but I do like to think that my honesty and frankness does more good than bad. show less</p> </div> <div style="margin-top: 10px;"> <p>Questions Answers More</p> <hr/> <p>How do they make eye glasses for small children? Specifically, how do they determine what prescription the child needs? Because older children and adults can do the "better, or worse" thing...but what about the infants you see with glasses, or children who don't talk yet, or wouldn't understand what's being asked of them in the "better or worse?" situation? 2 answers · Optical · 2 years ago</p> <p>I'd like to learn the basics of programming and coding, please help? I'm aware that learning programming and coding is a lengthy process, and there's LOTS of different languages to learn. I know there are kits out there designed to teach kids the basics, and they wind up building an actual little program or something in the process. So what I'm wondering, is there something like that for adults who are... show more 4 answers · Programming & Design · 2 years ago</p> </div> </div>
<p>tracking feedback for each of the selected one or more participants based at least in part on the published portion of the response, including determining a rating from the user for at least one of the selected one or more participants.</p>	<p>Attachment 9 (Questions Yahoo Answers (Webpage)) at 1.</p> <p>Plaintiff contends that feedback for each participant is tracked based on the provided response. That is, user can provide rating to at least one of the selected one or more participants.</p> <p>In case of Yahoo! Answers, user can provide ratings out of 5 stars to one or more participants based on their responses and can award "Best Answer" to one of the responses. Besides, the user also has options to "Like" or "Dislike" the response of each participant or can provide his comment on each participant's response.</p>

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	<div><div>Education & ReferencePreschool</div><div><div></div><div>What are the main symptoms for abdominal cancer?</div><div>Edit</div><div>0 following11 answers</div><div>Answers<div>Relevance</div></div><div><div></div><div>I don't think it's actually called that. A person can have stomach cancer or colon cancer or pancreatic cancer, or uterine cancer, all located in the abdominal area.</div><div>sparrow · 2 days ago</div><div>Award Best Answer</div><div>0</div><div>0</div><div>Comment</div></div><div><div></div><div>Blood in stool</div><div>Writer157 · 6 days ago</div><div>Award Best Answer</div><div>0</div><div>0</div><div>Comment</div></div><div><div></div><div>Depends what sort of cancer.</div><div>thinkingtime · 1 week ago</div><div>Award Best Answer</div><div>0</div><div>0</div><div>Comment</div></div></div></div> <div><p>[Snapshot taken after creating a user profile in Yahoo! Answers]</p></div>

- These allegations of infringement are preliminary and are therefore subject to change.

11. Yahoo has and continues to induce infringement. Yahoo has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., question and answer services on the Internet] and related services that provide question and answer services across the Internet such as to cause infringement of claims 1–11 of the '107 patent, literally or under the doctrine of equivalents. Moreover, Yahoo has known of the '107 patent and the technology underlying it from at least the date of issuance of the patent.

12. Yahoo has and continues to contributorily infringe. Yahoo has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., question and answer services on the Internet] and related services that provide question and answer services across the Internet such as to cause infringement of claims 1–11 of the '107 patent, literally or under the doctrine of equivalents. Moreover, Yahoo has known of the '107 patent and the technology underlying it from at least the date of issuance of the patent.

13. Yahoo has caused and will continue to cause NETSOC damage by direct and indirect infringement of (including inducing infringement of) the claims of the '107 patent.

IV. JURY DEMAND

NETSOC hereby requests a trial by jury on issues so triable by right.

V. PRAYER FOR RELIEF

WHEREFORE, NETSOC prays for relief as follows:

- a. enter judgment that Defendant has infringed the claims of the '107 patent through YAHOO.COM;
- b. award NETSOC damages in an amount sufficient to compensate it for Defendant's infringement of the '107 patent, in an amount no less than a reasonable royalty or lost profits, together with pre-judgment and post-judgment interest and costs under 35 U.S.C. § 284;
- c. award NETSOC an accounting for acts of infringement not presented at trial and an award by the Court of additional damage for any such acts of infringement;
- d. declare this case to be "exceptional" under 35 U.S.C. § 285 and award NETSOC its attorneys' fees, expenses, and costs incurred in this action;

- e. declare Defendant's infringement to be willful and treble the damages, including attorneys' fees, expenses, and costs incurred in this action and an increase in the damage award pursuant to 35 U.S.C. § 284;
- f. a decree addressing future infringement that either (i) awards a permanent injunction enjoining Defendant and its agents, servants, employees, affiliates, divisions, and subsidiaries, and those in association with Defendant from infringing the claims of the Patents-in-Suit, or (ii) awards damages for future infringement in lieu of an injunction in an amount consistent with the fact that for future infringement the Defendant will be an adjudicated infringer of a valid patent, and trebles that amount in view of the fact that the future infringement will be willful as a matter of law; and
- g. award NETSOC such other and further relief as this Court deems just and proper.

Respectfully submitted,

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